

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: : Case No. 18-12518-elf
Akin Lackey : Chapter 13
Debtor : Judge: Eric L. Frank

OBJECTION OF ANSON STREET, LLC TO DEBTOR'S CHAPTER 13 PLAN

AND NOW COMES, Anson Street, LLC ("Mortgagee") secured creditor and mortgage lien holder on the premises owned by Debtor and located at 1727 Dallas Street, Philadelphia, PA 19104 (the "Property"), by its attorneys, Pincus Law Group, PLLC, who hereby avers as follows:

1. Mortgagee is a secured creditor by way of a mortgage representing a lien on Debtor's real property as set forth above.
2. Debtor filed the instant Chapter 13 Petition on April 16, 2018.
3. Mortgagee will file a Proof of Claim on or before the bar date.
4. As of the date of the filing of the instant Chapter 13 petition, the Debtor had mortgage arrears, which arrears will be made exact upon the filing of a proof of claim.
5. Debtor's proposed Chapter 13 Plan incorrectly states that there are no arrears owed and lists neither Mortgagee nor the Property in Section 4 of the Plan for the maintenance of payment and cure of default regarding secured claims.

WHEREFORE, Anson Street, LLC respectfully requests that Debtor be required to file an Amended Chapter 13 Plan and/or to set forth the Property and lien held by Mortgagee and the correct amount of arrears and monthly payment due Mortgagee.

BY: /s/ Nicole B. LaBletta
Nicole LaBletta, Esquire
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CERTIFICATE OF SERVICE

I, Nicole LaBletta, certify that on June 19, 2018, I served true and correct copies of the Objection to Plan on the following parties in the manner specified for each party below:

VAUGHN A. BOOKER
Attorney for Debtor
Vaughn A. Booker Attorney Law
1420 Walnut Street, Suite 815
Philadelphia, PA 19102
Via CM/ECF

Trustee
William C. Miller, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105
Via CM/ECF

Akin Lackey
Debtor
1235 65th Ave, Unit B
Philadelphia, PA 19126-3608
Via US Mail

U.S. Trustee
United States Trustee
Office of the U.S. Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19107
Via CM/ECF

Dated: June 19, 2018

/s/ Nicole LaBletta
Nicole LaBletta, Esq.